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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 RON SCHRECKENGOST, an individual, and
ELIZABETH WALSH, an individual,
11
Plaintiff,
12 vs.
13 THE STATE OF NEVADA *ex rel.* the
NEVADA DEPARTMENT OF
14 CORRECTIONS; and PERRY RUSSELL, an
individual.
15
Defendants.

CASE NO: 3:19-cv-00659-MMD-CLB

STIPULATION, REQUEST,
AND [PROPOSED] ORDER
ENLARGING TIME FOR
PLAINTIFFS TO RESPOND TO
DEFENDANTS' MOTION TO DISMISS
(ECF 008)

(First Request)

17 The parties to this action, by and through their undersigned counsel of record hereby stipulate
18 that Plaintiffs may have a two (2)-week extension of time, **through and including Tuesday, March 3,**
19 **2020**, to file their opposition to *Defendants' Motion to Dismiss Plaintiffs' First Amended Complaint*
20 (ECF 008). Pursuant to this stipulation, the parties hereby request that the Court grant this enlargement
21 of time. This is the first request for such an extension. The original deadline to file this opposition
22 brief is Tuesday, February 18, 2020, which deadline has not yet run. The reason that Plaintiffs need
23 additional time to file this opposition brief is because the *Motion to Dismiss* is a dispositive motion that
24 has raised numerous and complex factual and legal issues against multiple defendants, which will
25 require additional time for Plaintiffs' counsel to prepare the opposition brief.

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1 This stipulation and request are not made for any dilatory or improper purpose.

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3 Dated this 14th Day of February.

THE GEDDES LAW FIRM, P.C.



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11 Dated this 14th Day of February.

AARON D. FORD
Nevada Attorney General

Electronic Signature Authorized

/s/ Brandon R. Price

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Nevada ex rel. its Department of
Corrections and
Perry Russell*

23 **ORDER**

25 Dated: February 18, 2020

IT IS SO ORDERED




UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Geddes Law Firm, P.C., and that on **February 14, 2020**, I caused to be served a copy of the foregoing *Stipulation, Request, and [Proposed] Order Enlarging Time for Plaintiffs to Respond to Defendants' Motion to Dismiss (ECF 008)(First Request)*, by filing the same with the Court's electronic filing system (PACER), addressed to the following:

AARON D. FORD
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